

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOHN M. NOLAN, JR	:	NO. 02-CV-2805 (PBT)
	:	
Plaintiff,	:	
v.	:	
	:	Electronically Filed
READING BLUE MOUNTAIN &	:	
NORTHERN RAILROAD	:	
COMPANY,	:	
	:	
Defendant.	:	

**PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE EVIDENCE AND
ARGUMENT THAT DEFENDANT COULD NOT LEGALLY CHANGE
THE TERMS OF MICHAEL BISCHAK'S EMPLOYMENT**

COMES NOW JOHN H. NOLAN, JR., plaintiff herein, and files this, his motion in limine to exclude any evidence and argument that the employer could not change the terms of Michael Bischak's employment for the reasons as set forth in the attached memorandum of law.

This 27th day of July, 2005.

s/Ralph E. Lamar, IV
Ralph E. Lamar, IV
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CERTIFICATE OF SERVICE

I, Ralph E. Lamar, IV, Esquire, hereby certify that on this the 27th day of July, 2005, caused a true and correct copy of the attached pleading to be served today upon Counsel for Defendant via electronic mail:

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By: s/Ralph E. Lamar, IV
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